

Ballingslöv International Group

Whistleblower Policy

Policy Owner: International	Magnus Hegdal, Deputy CEO & CFO Ballingslöv Intl
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Document Owner:	Anneli Bengtsson, Group Finance Director Ballingslöv International

BALLINGSLÖV INTERNATIONAL POLICY

Policies are issued by the CEO of Ballingslöv International and express the company's fundamental values and principles in matters of significant importance. A Ballingslöv International policy is mandatory and shall be observed by all companies and employees in the Ballingslöv International Group.

The CEO delegates responsibility for a specific policy to the appropriate representative of an area, who then becomes the Policy Owner.

Anyone who has questions or comments about the document or its application should in the first instance contact the Document Owner.

THE PURPOSE OF THE WHISTLEBLOWER POLICY

The purpose is to achieve and maintain an open business climate and high business ethics, across our value chain. A healthy speak-up culture of openness, integrity and accountability is essential in order to prevent, detect and react to suspected misconduct or non-compliance.

SCOPE

Ballingslöv International Group (BI) encourages and expects all employees, customers, suppliers, shareholders and other stakeholders to report incidents of non-compliance and suspected misconduct using the appropriate reporting channels. This Whistleblower Policy and the accompanying Whistleblower Guideline describe how to raise concerns regarding actual or suspected serious wrongdoings. The Whistleblower function provides the right to anonymously report serious wrongdoings without being targeted with any subsequent sanction, disadvantage or other retaliation. In order to ensure this, Ballingslöv International's Whistleblower system is hosted by an independent external service provider.

Certain jurisdictions may impose restrictions as to whom you may report on. Further instructions regarding the whistleblower process, what can be reported and not, case management handling can be found in the BI Group Whistleblower Guideline.

Data protection, Privacy and Zero tolerance to retaliation

Any processing of personal data will be made in compliance with applicable data protection legislation. All information received in connection with a report will be treated strictly confidential. The privacy of the subject of the report will be protected unless, and in such case only to the extent, required for performing the investigation. The identity of the sender of the report will not be disclosed unless the sender has been open with his/her identity or otherwise has approved of such disclosure in advance. A zero tolerance to retaliation against anyone who report wrongdoings in good faith in accordance with this policy and the Whistleblower guideline applies.

See appendix 1 for more information regarding whistleblowing data privacy.

Responsibilities

The Managing Director of each company is ultimately responsible for ensuring that the business activities are operated in line with this policy.

All staff and other concerned parties have an individual responsibility to understand and follow this policy. Anyone with knowledge of a suspected or actual serious wrongdoing is expected to report such conduct or irregularity either through Ballingslöv International Group's normal reporting channels or through our whistleblower system.

APPENDIX 1

What personal data is processed

We process all types of personal data that may occur in a report, such as name, role, description of work tasks etc. If the person sending the report chooses to reveal his/her identity and contact details, such name and contact details are also processed.

Purpose and legal basis for the processing

The personal data in the whistleblower system is processed in order to handle concerns regarding actual or suspected serious wrongdoings. The processing is based on the legal basis legitimate interest and is necessary to fulfil the above purpose.

Data controller and data processor

Data controller: Ballingslöv International AB
Phone: +46 (0)40 627 08 00
Address: Jungmansgatan 12, 211 11 Malmö

Data processor: WhistleB Whistleblowing Centre AB
Phone: +46 (0)70 444 32 16
Address: Box 70396, 107 24 Stockholm

With whom we share/may share your personal data

Personal data may be disclosed to:

- legal entities (companies) within Ballingslöv International Group other than Ballingslöv International AB
- so-called processors (other companies which process personal data on Ballingslöv International's behalf) e.g. suppliers of IT systems, system management and support, or IT infrastructure providers

Access rights to data in the whistleblower system are restricted so that only persons who need the information in order to handle reports and conduct investigations can access it.

Ballingslöv International Group uses WhistleB as a data processor for the whistleblower system. WhistleB may only process personal data in the whistleblower system in accordance with Ballingslöv International's instructions. A data processing agreement has been signed between Ballingslöv International and WhistleB.

In the event that it is necessary for the investigation, it is also possible that parts of the material is shared with other processors to Ballingslöv International Group, within or outside Sweden. Personal data may thus be transferred to a country outside the EU/EEA. If personal data is transferred to a country in which an adequate level of protection for personal data has not been assessed, Ballingslöv International will ensure that appropriate safeguards are taken.

For how long do we store the personal data?

The personal data will be deleted from the whistleblower system after review and decision that a report is not a whistleblower case. The case may then be forwarded for handling in accordance with Ballingslöv International Group's ordinary reporting routes. In case a report moves forward to an investigation, all personal data will be deleted from the whistleblower system when the investigation has been concluded and closed, with the exception of when personal data must be maintained according to applicable laws and regulations.

Your rights

You have the right to request;

- information about the use of your personal data and
- correction of incorrect personal data

In certain cases, you also have the right to erasure of personal data, or restriction of the processing, and you are entitled to object to the processing.

The rights stated above are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case.

Data protection officer

Ballingslöv International Group has appointed Deputy CEO & CFO as a data protection officer (DPO) who shall on an overall level ensure that we comply with the GDPR. The DPO can be reached at magnus.hegdal@ballingslov.se and by telephone +46 766 27 08 03.

Complaints

If you think that Ballingslöv International's processing of your personal data contravenes data protection legislation, we ask you to contact Ballingslöv International AB, using the above contact details, so that we can rectify any inaccuracies.

Complaints can be submitted to the supervisory authority (the Data Protection Authority in Sweden or your local supervisory authority) where you believe that Ballingslöv International is processing your personal data in violation of data protection legislation.